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APR 5 1999

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of	)	
	)	
Implementation of the Local	)	CC Docket No. 96-98
Competition Provisions of the	)	
Telecommunications Act of 1996	)	
	)	
Petition of Southwestern Bell Telephone	)	
Company, Pacific Bell, and Nevada Bell	)	
for Expedited Declaratory Ruling on	)	NSD File No. 98-121
Interstate IntraLATA Toll Dialing or, in	)	
the Alternative, Various Other Relief	)	

**PETITION OF PACIFIC BELL AND NEVADA BELL  
FOR ADDITIONAL WAIVERS**

Pacific Bell and Nevada Bell hereby petition the Commission for a waiver of the May 7, 1999 date for intraLATA dialing parity that might be applied to these companies and that is in the Commission's Order dated March 23, 1999. Specifically, Pacific Bell and Nevada Bell request a waiver of the May 7, 1999 implementation date until June 15, 1999, a date well within the time period that the Commission established as reasonable in its Order (i.e., May 7, 1999 through August 6, 1999).<sup>1</sup> As we explain further below, both companies need to perform system modifications to implement full intraLATA toll dialing parity and cannot do so in time to meet the May 7, 1999 date.

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List A B C D E

<sup>1</sup> Implementation date as used herein means the date when the Pacific Bell and Nevada Bell systems will be able to accept the intraLATA PIC change orders and to begin processing them.

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List A B C D E		for Additional Waivers
		CC Docket No. 96-98, NSD File No. 98-121
		April 2, 1999

1. In its March 23, 1999 Order, the Commission established the following schedule for the State implementation:

May 7, 1999 for those LECs with already filed and approved State intraLATA toll dialing parity plans.

April 22, 1999 for plans yet to be filed with the States, which must approve the plans no later than June 22, 1999 and which must be effective 30 days after approval.

August 6, 1999 for those LECs without already filed and approved State intraLATA toll dialing parity plans and who are directed to file such plans with the Common Carrier Bureau on June 22, 1999.

2. Pacific Bell and Nevada Bell previously filed State Plans on intraLATA toll dialing parity in California and Nevada. The State orders on those plans assumed implementation of intraLATA toll dialing parity would not occur until Pacific Bell and Nevada Bell Section 272 affiliates were providing in-region interLATA services.<sup>2</sup> The State orders required that implementation of dialing parity would coincide with long distance entry. The orders implementing those plans were based on settlement agreements that resolved implementation issues and that likewise assumed implementation coincident with long distance market entry.

3. The Commission's Order has changed the implementation deadlines and the implementation assumptions for those State orders and for the two underlying settlement agreements. The State adopted implementation requirements cannot be accomplished by May 7, 1999, and the California implementation plan necessarily will have to be resubmitted and revised to reflect the changed circumstances.<sup>3</sup>

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<sup>2</sup> See, In the Matter of Alternative Regulatory Framework for LECs (IntraLATA Presubscription Phase), Decision No. 97-04-083, 1997 WL 377077 (Cal. P.U.C., April 23, 1997); In Re the Filing by Nevada Bell (Docket No. 97-2010), Modified Compliance Order, December, 1997.

<sup>3</sup> For example, the California plan assumed a longer notification than can be accomplished under the new schedule.

4. More importantly, for operational reasons unique to Pacific Bell and Nevada Bell, they cannot implement intraLATA toll dialing parity in California and Nevada by the May 7, 1999 implementation date.

5. As stated in the attached declaration of Violeta Diaz, in late Fall 1998 Pacific Bell began the process of implementing interstate-only intraLATA toll dialing parity in LATA 730 in California in the expectation that the Commission would require separate implementation of interstate-only intraLATA dialing parity by February 8, 1999. As Pacific Bell and Nevada Bell advised the Commission in their September 18, 1998 Petition for Expedited Declaratory Ruling on Interstate IntraLATA Toll Dialing Parity or, in the Alternative, Various Other Relief, their networks were "already prepared" for full 2 PIC intraLATA presubscription at the time the Petition was filed and that work would have to be "reversed or otherwise modified" in order "to implement interstate-only ILP." Pet., p. 3. Pacific Bell and Nevada Bell also pointed out that, in order to meet the February date, work on their networks would have to commence by October 15, 1998. Id.

6. Pacific and Nevada Bell did just what they advised the Commission would have to be done in order to be in position to implement interstate-only intraLATA dialing parity by February 8, 1999. On or about October 15, 1998, Pacific Bell and Nevada Bell began to modify their forty-one ordering, provisioning and service assurance systems to make these systems capable of identifying an "interstate only" 2 PIC call. See attached declaration of Nancy Forst. As a result, some of the work done in the Fall of 1998 to be prepared for interstate-only dialing parity now must be redone to enable their systems to handle both intrastate intraLATA and interstate intraLATA dialing parity on the same date.

7. Now that the Commission has ordered full statewide implementation of dialing parity and provided projected implementation dates, the systems modifications described above must be reversed to eliminate the "interstate-only" 2 PIC intraLATA capability, and system modifications must be made to reinstall full 2 PIC capability. As the attached sworn declarations demonstrate: Systems project management must ensure that Business Requirements and Systems Requirements for the specific intraLATA presubscription changes are defined. Next, the systems must be designed and the software changes (programming and coding) made. Finally, the modifications must be tested and installed into production operations. Based on our experience in making the changes in the Fall of 1998, the entire process can take as long as 120 days. Although the process is underway, it is still complex and time consuming and cannot be completed on a combined basis before June 15, 1999.<sup>4</sup>

8. Nevada Bell has begun the process of making the necessary systems changes based on discussions with the Nevada Attorney General, Office of Consumer Advocate and the Public Utility Commission of Nevada (NPUC) Staff. Pacific Bell commenced making the network and software changes the week of March 22, 1999 following receipt of the Commission's Order.

9. Thus, neither Pacific Bell nor Nevada Bell can operationally meet the May 7, 1999 deadline for implementing full intraLATA toll dialing parity and waivers of that deadline for them are not only necessary, but required.

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<sup>4</sup> Nevada Bell can complete the work somewhat earlier, i.e., on June 9, 1999, but it is more efficient for implementation in California and Nevada to occur on the same date (June 15, 1999) since they have common ordering, provisioning and billing systems.

10. The waiver requests of Pacific Bell and Nevada Bell in this regard are within the zone of reasonableness of the Commission's modified schedule. As noted, both companies have already commenced efforts to make the necessary changes in their systems. Pacific Bell and Nevada Bell can implement full intraLATA dialing parity in California and Nevada on June 15, 1999, which is only six weeks longer than for States with already approved State plans and a week before the June 22, 1999 date, for the States without such plans, to approve them.

11. Granting the waiver would be in the public interest for the further reason that it would allow additional time to train service representatives and to educate customers so as to avoid problems such as cramming and slamming. Conversely, implementing intraLATA dialing parity before there can be the required system modifications would not be in the public interest since it would impact service quality and seamless transitioning and would likely generate complaints to this Commission and to the California and Nevada PUCs.

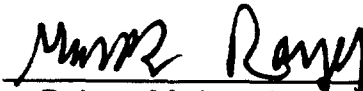
12. Pacific Bell and Nevada Bell request a response to their waiver requests by April 15, 1999. A response by that date is necessary for Pacific Bell and Nevada Bell to do the advance work necessary to provide reasonable customer notice of the date when they can make a selection, to avoid confusion and potential slamming abuses through customer education and to minimize complaints and calls to the business office.

## CONCLUSION

WHEREFORE, Pacific Bell and Nevada Bell request the Commission to grant Pacific Bell and Nevada Bell an additional waiver of the intraLATA toll dialing parity rule such that they will not be required to implement full intraLATA toll dialing parity in California and Nevada before June 15, 1999. For all of the above reasons, such an additional waiver is unavoidable and in the public interest.

Respectfully submitted,

PACIFIC BELL  
NEVADA BELL

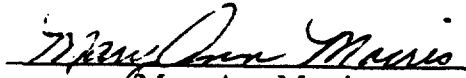
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**Certificate of Service**

I, Mary Ann Morris, hereby certify that the foregoing "Petition for Additional Waivers, of SBC Communications Inc." in CC Docket 96-98, NSD File No. 98-121 has been served on April 2, 1999 to the Parties of Record.

  
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